

THE HONORABLE JAMES L. ROBERT

**John A. Cochran**, OSB No. 020022  
PACIFIC PROPERTY LAW LLC  
Pacific Property Law LLC  
8802 NE Hwy 99, Ste. B, #64  
Vancouver, WA 98665  
Telephone: 503.756.0299  
E-mail: johnppllc@gmail.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PAUL J. BECK, et. al,

Plaintiff,

v.

US BANK NATIONAL ASSOCIATION, et  
al.

Defendant.

Case No. C17-0882JLR

UNOPPOSED MOTION  
FOR EXTENSION OF TIME  
TO RESPOND TO  
BAYVIEW MOTION TO DISMISS  
SECOND AMENDED COMPLAINT

AND ORDER

**STIPULATION**

Comes now Plaintiffs, Paul Beck and Lin O. Beck, appearing through counsel, John A. Cochran and moves the Court for a Motion for Extension to Respond to Defendant's Motion to Dismiss Becks' Complaint. Defendant filed a motion to dismiss Plaintiff's complaint on August 11, 2017. Plaintiff asks the Court for an extension of time to respond to said Defendants' Motion to Dismiss for the following reasons:

1.

Plaintiff's Attorney had family emergency out of state and also several critical deadlines and trial throughout last few weeks of August and First week of September.

2.

UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO US BANK NA'S MOTION TO DISMISS  
BECK'S COMPLAINT - 1

PACIFIC PROPERTY LAW LLC  
8802 NE HWY 99, STE. B, #64  
VANCOUVER WASHINGTON 98665  
503.756.0299 E-MAIL: johnppllc@gmail.com

1  
2  
3 In effect, because of these various conflicts, it made it difficult to respond in full by the  
4 deadline for Plaintiff's response to Defendant's Motion to Dismiss. Additionally, Mr. Cochran  
5 and Mr. Laurick are attempting to discuss a settlement proposal consisting of cash for keys and  
6 a short sale and/or the latest temporary payment plan terms but have not come to terms on any  
7 exact proposal yet.

8 4.

9 Mr. Cochran has communicated that he needs an extension to Mr. Laurick, Counsel for  
10 Defendant and Mr. Laurick had no objection and did not oppose Mr. Cochran's request for  
11 extension to respond to Defendant's Motion to Dismiss. Mr. Laurick agreed to a two-week  
12 extension date of Tuesday, September 26, 2017.

13 5.

14 Defendants' counsel, James Laurick and Plaintiff's counsel, John A. Cochran have  
15 conferred and agree to set the Extension of the deadline to Respond to the Motion to Dismiss  
16 to Tuesday, September 26, 2017.

17 6.

18 Therefore, Plaintiff requests for an extension to Respond to Defendants' Motion to  
19 Dismiss to Tuesday, September 26, 2017.

20 Dated September 12, 2017


21 /s/ John A. Cochran, OSB No. 020022  
22 johnpplllc@gmail.com  
23 Pacific Property Law LLC  
24 8802 NE Hwy 99, Ste. B, #64  
25 Vancouver, WA 98665  
26 Telephone: 503-756-0299  
27

**ORDER:**

IT IS THEREFORE ORDERED:

Plaintiff is hereby granted an Extension of Time to Respond to Defendants' Motion to Dismiss until Tuesday, September 26, 2017.

DATED: September 12, 2017

  
HONORABLE JAMES L. ROBART